

May 1, 2003

Federal Communications Commission

Subject: Comment Re: ET Docket 03-104 Broadband Over Power Lines

Dear FCC,

Please do not allow "Broadband Over Power Lines" computer networking for the following reasons"

1. The frequency spectrum of this technique, approximately 2 - 80 MHz, will lie within the Amateur Radio spectrum, among others, causing undue interference to Amateur receivers .
2. Because of the physical nature of power line wiring the networking receivers in the system will have to be very sensitive to ensure that networking signals can be received in a system with many standing wave and it will require very sensitive networking receivers if a tap point on the power line is at a signal null because of the standing waves on a varying impedance power line system, or, there may be a push to pass legislation to increase the Part 15 Devices Maximum Power limits, creating even more interference to non BPL devices.
3. The same power lines will be acting as antennas to external signals and Amateur Radio power levels of 1.5 KW PEP are permitted in the Amateur frequency spectrum encompassed by the above networking scheme. This will have the effect of coupling extremely large signals into the networking receivers, possibly causing failure to the networking receivers or, at a minimum, disrupting networking operation even though Amateur Radio transmitters, at any given transmission, operate on a very narrow slice of the spectrum, not broadband as the proposed BPL equipment does.
4. Another of my concerns is that if an Amateur Station is operating legally, but causing interference to networking systems, then the Amateur Station may have quiet hours imposed on the station or given a cease and desist order when they are operating their station legally.
5. I personally am doing a lot more now to prepare for EMERGENCY COMMUNICATIONS after the tragedy of September 11, 2001, and I am concerned for all the Amateur Radio Stations that may be hindered in their developing emergency radio nets and procedures, if they are hampered in participating in training, because interference from networking over power lines may render their Amateur Radio Stations unusable.
6. All the above is referenced to the first paragraph in the FCC R&R, CFR 47, PART 97 , the purpose of Amateur Radio.

Respectfully Submitted,
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